



Sandwich Isles  
Communications, Inc.

A Waimana Company

March 17, 2014

Federal Communications Commission  
Julie A. Veach – Chief Wireline Competition Bureau  
Washington, DC 20554

Re: Study Area Boundary Maps (DA 14-28)

Dear Ms. Veach:

Sandwich Isles Communications Inc. (SIC), in filing its study area boundary maps, has concerns with service area overlap by Hawaiian Telcom. We believe the relevant facts regarding our Study Area are:

1. SIC only serves areas known as Hawaiian Home Lands (HHL);
2. Hawaiian Home Lands are trust lands set aside by the United States through the Hawaiian Homes Commission Act of 1921;
3. The administration of the HHL trust lands was transferred to the State as part of the Hawaii Statehood Act of 1959. The United States retains oversight role as a trustee through the Department of Interior to ensure that the State meets its trust responsibilities;
4. The State Department of Hawaiian Home Lands (DHHL) administers HHL;
5. DHHL is overseen by the Hawaiian Homes Commission (HHC);
6. In 1995, DHHL granted an exclusive license to Waimana Enterprises, Inc. to provide all telecommunications to HHL;
7. Waimana meets its obligations under the License through wholly owned subsidiaries, primarily SIC;
8. SIC was granted a Study Area Waiver by the Federal Communications Commission in 2005;
9. SIC's Study Area consists of a portion of HHL; and
10. The FCC designated HHL as tribal lands in its Transformation Order in 2011;

To the extent there is any overlap in boundaries claimed by Hawaiian Telcom, SIC believes its Study Area has been clearly defined, delineated and recognized. If you have any questions, then please contact the undersigned.

Very truly yours,

Sandwich Isles Communications, Inc.

By 

Janeen-Ann A. Olds  
President